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Attorneys for Movant Trigon Trading Pty. Ltd.

8 **UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

10 GGCC, LLC, an Illinois Limited Liability
11 Company, Individually and on Behalf of All
12 Others Similarly Situated,

13 Plaintiff,

14 v.

15 DYNAMIC LEDGER SOLUTIONS, INC., a
16 Delaware Corporation, TEZOS STIFTUNG,
17 a Swiss Foundation, KATHLEEN
18 BREITMAN, an Individual, and ARTHUR
19 BREITMAN, an Individual,

20 Defendants.

Case No. 3:17-cv-06779-RS

**SUPPLEMENTAL STATEMENT
REGARDING CERTIFICATION OF
INTERESTED ENTITIES OR PERSONS**

ANDREW OKUSKO, individually and on
behalf of all others similarly situated,

Case No. 3:17-cv-06829

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC.,
THE TEZOS FOUNDATION, KATHLEEN
BREITMAN, ARTHUR BREITMAN, and
TIMOTHY DRAPER,

Defendants.

ANDREW BAKER, individually and on
behalf of all others similarly situated,

Case No. 3:17-cv-06850-RS

Plaintiff,

*Removed from San Francisco County
Superior Court (Case No. CGC-17-562144)*

v.

DYNAMIC LEDGER SOLUTIONS, INC., a
Delaware Corporation, THE TEZOS
FOUNDATION, a Swiss foundation,
KATHLEEN BREITMAN, an individual,
ARTHUR BREITMAN, an individual,
JOHANN GEVERS, an individual,
STRANGE BREW STRATEGIES, LLC, a
California limited liability company, and
DOES 1 through 100 inclusive,

Defendants.

**SUPPLEMENTAL STATEMENT REGARDING
CERTIFICATION OF INTERESTED ENTITIES OR PERSONS**

In a telephone call today—hours before the deadline for oppositions to be filed regarding the lead plaintiff motions—counsel for Arman Anvari called undersigned counsel to state that, in Anvari’s view, Trigon Trading Pty. Ltd.’s Certification of Interested Entities (ECF No. 58), filed pursuant to Civil L.R. 3-15 was incomplete because it did not disclose Trigon’s officers (who happen to also be members and employees of an Australian law firm)¹ and a related entity that was listed as an “Ultimate Holding Company” in a filing made by Trigon with an Australian securities regulator. Revealing his true purpose, Anvari’s counsel suggested that if Trigon withdrew to avoid “embarrassment,” Anvari would not raise this “issue” with the Court.²

If Anvari’s overly literal reading of L.R. 3-15’s reference to “a financial interest of any kind” were accepted, it would require any non-human party to make voluminous disclosures of literally every single shareholder, officer, director, etc. Trigon does not believe that is a reasonable interpretation of the rule. For example, Defendant Dynamic Ledger Solution, Inc.’s “Certification Of Interested Entities Or Persons Pursuant To L.R. 3-15” (ECF No. 28) merely states:

Pursuant to Civil L.R. 3-15, the undersigned certifies that the following listed persons, associations of persons, firms, partnerships, corporations (including parent corporations) or other entities (i) have a financial interest in the subject matter in controversy or in a party to the proceeding, or (ii) have a non-financial interest in that subject matter or in a party that could be substantially affected by the outcome of this proceeding:

- Draper Associates V Crypto LLC is a shareholder of Defendant Dynamic Ledger Solutions, Inc.

Obviously this is not a complete listing of all of DLS’s shareholders. As Draper’s counsel

¹ Trigon obviously had no intention of concealing any of this. Its filings with the Australian securities regulator are publicly available. Its certification was signed by Anna Dupont who can readily be identified as an employee of the Salerno law firm and the Salerno consortium. *See, e.g.*, <https://www.salernolaw.com.au/personnel/anna-dupont/>; <https://www.linkedin.com/in/anna-dupont-58966ba3/>.

² The fact that Anvari (who would have had the largest financial interest but failed to comply with the PSLRA) feels the need to resort to these kind of tactics betrays the weakness of his position.

1 stated at the hearing on the TRO filed in *MacDonald*, Draper Associates has only “a minority
2 interest in DLS.” (*MacDonald*, ECF No. 45 (Transcript) at 50:15-16).

3 Nonetheless, for avoidance of any doubt and to avoid a sideshow over this non-issue,
4 attached hereto as Exhibit A is Trigon’s publicly available “Current Company Extract” derived
5 from the Australian Securities and Investments Commission’s database and current as of February
6 9, 2018 (the “ASIC Filing”). The ASIC Filing lists, among other things, Trigon’s officeholders,
7 secretary, registered address, and shareholder information.
8

9 DATED: February 8, 2018

/s/ Joel Fleming

BLOCK & LEVITON LLP

Joel Fleming (SBN 281264)

*Attorney of Record for
Trigon Trading Pty. Ltd.*

CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2018, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system. I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Joel Fleming
Joel Fleming